

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In the Matter of:

Jermaine A. Blyden

Debtor(s)

} Case No. 18-35397
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}
}

Chapter 13

Judge Barnes

NOTICE OF MOTION

TO:

Marilyn O Marshall, Chapter 13 Trustee, 224 South Michigan, Ste 800, Chicago, IL 60604, via electronic court notification;

Roundpoint Mortgage, 5032 Parkway Plaza Blvd, Charlotte, NC 28217, via U.S. Mail;

4908-4910 S Vincennes Condominium Association, c/o Cervantes, Chatt, & Prince PC, 16w343 83rd St Ste A, Burr Ridge, IL 60527 via U.S. Mail;

Ronald J. Kapustka, Attorney for 4908-4910 S Vincennes Condominium Association, Kovitz Shifrin Nesbit, 175 N. Archer Ave., Mundelein, IL 60060, via U.S. Mail;

Insync Property Management, PO Box 5032, Chicago, IL 60680, via U.S. Mail;

Capital One Auto Finance, PO Box 30285, Salt Lake City, UT 84130, via U.S. Mail;

First Bank of Puerto Rico, PO Box 9146, San Juan, PR 00908, U.S. Mail;

Jermaine A. Blyden, 4910 S. Vincennes Ave., Unit 2, Chicago, IL 60615; via U.S. mail;

SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE that on April 22, 2021, at 1:30 p.m., I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the motion of Debtor to Modify Plan, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password. To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

PROOF OF SERVICE

I, the undersigned, certify that I caused this Notice and a copy of the attached document(s) to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 8707 Skokie Blvd Suite 305, Skokie, IL 60077 on March 30, 2021, except that the Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ David Freydin _____
David Freydin, Esq
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, IL 60077
Phone: 847.972.6157

Capital One Auto Finance c/o AIS Portfolio S
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Capital One Auto Finance, a division of Capi
P.O. BOX 165028
IRVING, TX 75016-5028

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

4908-4910 S. Vincennes Condominium Associati
c/o Cervantes Chatt & Prince P.C.
16W343 83rd Street, Suite A
Burr Ridge, IL 60527-7950

Cach, LLC
PO Box 5980
Littleton, CO 80127

(p)CAINE & WEINER COMPANY
12005 FORD ROAD 300
DALLAS TX 75234-7262

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One Auto Finance
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One Auto Finance
a division of Capital One, N.A.
P.O. Box 165028
Irving TX 75016-5028

Capital One Auto Finance c/o AIS
Portfolio Services, LP f/k/a AIS Data
Services d/b/a/ Ascension Capital Group
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Chase Cardmember Services
PO Box 15678
Wilmington, DE 19885-5678

Cimarron Mtg
Po Box 1325
Ruston, LA 71273-1325

City of Chicago
Department of Finance
PO Box 88292
Chicago, IL 60680-1292

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W. Jackson Blvd Ste. 600
Chicago, IL 60604-3517

Convergent Outsourcing
PO Box 9004
Renton, WA 98057-9004

Fed Loan Sevicing
Po Box 69184
Harrisburg, PA 17106-9184

First Bank of Puerto Rico
PO Box 9146
San Juan, PR 00908-0146

First Premier Bank
601 S Minneapolis Ave
Sioux Falls, SD 57104

Fst Premier
601 S Minneapolis Ave
Sioux Falls, SD 57104

Internal Revenue Service
PO BOX 7346
Philadelphia, PA 19101-7346

Lou Harris Company
1040 S Milwaukee Ave Ste
Wheeler, IL 60090-6375

Navient
Attn: Bankruptcy
Po Box 9500
Wilkes-Barr, PA 18773-9500

Navient Solutions, LLC on behalf of USA Fund
Attn: Bankruptcy Litigation Unit E3149
PO Box 9430
Wilkes Barre, PA 18773-9430

Onemain Financial/Citifinancial
6801 Colwell Blvd
Ntsb-2320
Irving, TX 75039-3198

Pentagon FCU
Po Box 1432
Alexandria, VA 22313-1432

Pentagon Federal Cr Un
Attention: Bankruptcy Department
2930 Eisenhower Ave
Alexandria, VA 22314-4557

RoundPoint Mortgage Servicing Corporation
5016 Parkway Plaza Blvd Suite 200
Charlotte, NC 28217-1930

RoundPoint Mortgage Servicing Corporation
c/o The Wirbicki Law Group, LLC
33 W. Monroe St., Ste.1140
Chicago, IL 60603-5332

Roundpoint Mtg
5032 Parkway Plaza Blvd
Charlotte, NC 28217-1918

SunTrust
PO BOX 79041
Baltimore, MD 21279-0041

US Dept of Education
Attn: Bankruptcy
Po Box 16448
Saint Paul, MN 55116-0448

Us Dept Ed
Ecmc/Bankruptcy
Po Box 16408
St Paul, MN 55116-0408

Usa Funds/sallie Mae Servicing
Cbe Group
Po Box 900
Waterloo, IA 50704-0900

David Freydin
Law Offices of David Freydin Ltd
579 W. North Ave
Suite 203
Elmhurst, IL 60126-2144

Jermaine A Blyden
4910 S. Vincennes Ave, Unit 2
Chicago, IL 60615-2418

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Caine & Weiner
Attn: Bankruptcy
21210 Erwin St
Woodland Hills, CA 91367

Portfolio Recovery Associates, LLC
Successor to CAPITAL ONE BANK(USA), N.A.
(ORCHARD BANK)
POB 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)RoundPoint Mortgage Servicing Corporation

End of Label Matrix	
Mailable recipients	43
Bypassed recipients	1
Total	44

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In the Matter of:

Jermaine A. Blyden

Debtor(s)

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Case No. 18-35397

Chapter 13

Judge Barnes

DEBTOR'S MOTION TO MODIFY PLAN

NOW COMES THE DEBTOR by and through his attorney, David Freydin, and requests that this Honorable Court modify the Chapter 13 Plan under Section 1329 for the reasons below, and in support thereof, state as follows:

1. That the Debtor filed a Chapter 13 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 18-35397 on December 22, 2018.
2. That this Honorable Court confirmed the Debtor's Chapter 13 Plan on March 7, 2019, with secured creditors to be paid 100.00% and general unsecured creditors to be paid 100.00%.
3. That the Debtor has not converted the instant Chapter 13 case to a Chapter 7 case.
4. That the Debtor's confirmed plan requires him to pay \$1,600.00 per month for 60 months.
5. That on October 18, 2019, this Honorable Court entered an order increasing Debtor's Chapter 13 payments to \$2,000.00 per month (effective September 2019) for the remainder of the case.
6. That RoundPoint Mortgage Servicing Corporation filed a motion for relief from stay on October 2, 2020, which was granted on October 15, 2020.
7. That the Trustee subsequently stopped making pre-petition arrears payments to the Debtor's HOA, 4908-4910 S Vincennes Condominium Association (the "HOA").

8. That the Debtor has resolved the mortgage arrears with Roundpoint and asks the Trustee to resume making payments on Debtor's pre-petition HOA arrears per section 3.2 of the plan.
9. That Debtor requests that the Trustee pay the remaining prepetition HOA arrears of \$14,961.31 per section 3.2 of the Plan with set monthly payments of \$1,000.00 (0.00% interest).
10. On information and belief, the HOA will move for relief from the automatic stay if Debtor does not pursue the modification as set forth above.
11. That the case will still complete within 60 months and Debtor will continue to provide a 100% dividend to both secured and unsecured creditors.
12. That the Debtor filed the instant case in good faith and intends to complete the Plan of Reorganization.

WHEREFORE THE MOVANT PRAYS that this Honorable Court enter an order modifying the Chapter 13 plan to:

- A. Allow the Chapter 13 Trustee to resume making payments to 4908-4910 S. Vincennes Condominium Association for Debtor's prepetition HOA arrears.
- B. Pay 4908-4910 S. Vincennes Condominium Association's remaining prepetition arrears claim of \$14,961.31 in Section 3.2 with 0.00% interest and set monthly payments of \$1,000.00 per month effective immediately.
- C. For such other and further relief this Court deems just and proper.

Respectfully submitted,

/s/ David Freydin
David Freydin
Law Offices of David Freydin, PC
8707 Skokie Blvd., Suite 312
Skokie, IL 60077
Phone: 847.972.6157